

February 9, 2026

Senator Mizell
Chairman
Senate Committee on Commerce, Consumer Protection & International Affairs

Representative Deshotel
Chairman
House Commerce Committee

Emily Andrews
Special Counsel
Office of the Governor

Via electronic submission:
apa.s-com@legis.la.gov; apa.h-com@legis.la.gov; Emily.Andrews@la.gov

Re: Louisiana Economic Development – Annual Rules Report

Pursuant to R.S. 49:966 (K), I am submitting the enclosed report of action taken by Louisiana Economic Development (LED) with respect to the adoption, amendment, or repeal of rules and proposed fee adoptions, increases or decreases. This report includes actions taken on rules which were proposed between January 1, 2025 and December 31, 2025, including the following specific initiatives:

1) EO JML 25-038 – Agency review of *certain* rules which have not been changed for twenty years or more.

LED has reviewed 100% of the agency rules listed in **Exhibit A**, which encompass approximately 20 agency incentive program rules. To date, the following 4 program rules were evaluated, determined to be obsolete and unnecessary, and have therefore been repealed; Title 13: LA Biomedical Research & Development Park, Part I 1301 et. seq., and LA University Research and Development Parks Programs, Part I 1501 et seq.; Title 19: Minority Business Enterprise; and Office of Women's Business Enterprise. In 2026, LED will continue its evaluation and will revise or delete the remaining rules as may be deemed appropriate.

2) La. R.S. 49:964 (D) – Act 192 (2024 R.S.) – Agency review of *all* rules within a 5 year period.

LED's rules are primarily contained within Titles 13 and 19 of the Louisiana Administrative Code (LAC), with a few tax credit incentive program rules contained within Title 61. In 2025, LED reviewed the approximately 20 agency incentive program rules outlined in EO JML 25-038, and a complete listing of agency rules reviewed since the beginning of the five year period, with proposed agency action, if any, are detailed below in **Exhibit B**.

To date, LED has reviewed approximately 40% of all agency rules, and is on track to review 100% of agency rules within the five-year period, 8/1/2024-7/31/2029.

3) La. R.S. 49:964 (B) – Act 454 (2018 R.S.) - All rules public hearing.

No petitions or submissions were received during 2025 to adopt a new rule, amend or repeal a current rule in accordance with the provisions of La. R.S. 49:950 et seq.

LED held the public hearing required by Act 454 on December 3, 2025, as stated in the Potpourri published in the Louisiana Register on October 20, 2025, attached as **Exhibit C**. Interested persons were provided an opportunity to submit oral or written comments regarding any rule or regulation of LED which the person believed to be contrary to law, outdated, unnecessary, overly complex or burdensome.

Approximately a dozen individuals, representing various community and environmental activist groups used the hearing as a platform to air complaints and concerns about LED's economic development activities in general. The sign-in sheet and summary of oral testimony given are attached as **Exhibit D**.

2 sets of written comments were received and attached as **Exhibit E** to this report, representing the following organizations: Rural Roots Louisiana, The Descendants Project, Mt. Triumph Baptist Church, Fisherman Involved in Sustaining Our Heritage (FISH), Inclusive Louisiana, Louisiana Bucket Brigade and 2 individual neighbors of the proposed Meta Data Center.

LED considered fully all written and oral comments, and provides the following responses: To the extent that concerns were raised regarding vague public notice, LED responds that appropriate notice was provided in accordance with state law, including publication of a Potpourri Notice in the Louisiana Register, posting on LED's website, posting at the hearing location in the La Salle Building and electronic notice via an email blast to various interested parties via its listserv sign-up. To the extent that concerns were raised regarding abuse of emergency rulemaking for its Site Investment and Infrastructure Improvement Fund Program Rules, LED responds that such emergency rulemaking action was permissive under La. R.S. 51:2316 and its enabling authority Act 365 of the 2025 Regular Legislative Session. As to all other comments, generally characterized as criticisms of LED's economic development activities, LED responds that we will not apologize for attracting jobs, wages and new opportunities for the state.

A copy of this report will be placed on LED's website and be made available to all interested persons.

Should you have any further questions regarding this matter please do not hesitate to reach out.

Sincerely,

Anne G. Villa
Deputy Secretary/CFO
Louisiana Economic Development

Louisiana Economic Development: Annual Rules Report for 2025

Industrial Tax Exemption Program

Emergency Rule:	May 20, 2024
Emergency Rule - Renewal	November 20, 2024
Notice of Intent:	December 20, 2024
Public Hearing:	January 30, 2025
Oversight Committee Summary Report Submittal:	February 10, 2025
Rule – final publication:	March 20, 2025

Electronic Meetings & Disability Accommodations

Notice of Intent:	October 20, 2024
Public Hearing:	November 25, 2024
Oversight Committee Summary Report Submittal:	December 2, 2024
Rule – final publication:	January 20, 2025

Louisiana Economic Development Procurement Code

Emergency Rule:	October 20, 2024
Notice of Intent:	November 20, 2024
Public Hearing:	January 3, 2025
Oversight Committee Summary Report Submittal:	January 10, 2025
Rule – final publication:	February 20, 2025

Motion Picture Production Tax Credit Program

Emergency Rule:	June 30, 2025
Emergency Rule – Renewal:	December 23, 2025

High Impact Jobs Program

Emergency Rule:	July 20, 2025
Notice of Intent:	August 8, 2025
Public Hearing:	October 1, 2025
Oversight Committee Summary Report Submittal:	October 14, 2025
Rule – final publication:	December 20, 2025

Small and Emerging Business Development Program

Notice of Intent:	August 8, 2025
Public Hearing:	September 29, 2025
Oversight Committee Summary Report Submittal:	October 12, 2025
Rule – final publication:	November 20, 2025

Minority Business Enterprise

Notice of Intent:	September 4, 2025
Public Hearing:	November 3, 2025
Oversight Committee Summary Report Submittal:	November 5, 2025
Rule – final publication:	December 20, 2025

Office of Women's Business Enterprise

Notice of Intent:

Hearing:

Oversight Committee Summary Report Submittal:

Rule – final publication:

September 4, 2025 Public

November 3, 2025

November 5, 2025

December 20, 2025

Louisiana Economic Development – Notice of Public Hearing

Request for Comments on Rulemaking

Potpourri:

Public Hearing:

October 20, 2025

December 3, 2025

Site Investment and Infrastructure Improvement Fund

Emergency Rule:

Notice of Intent:

Public Hearing:

Oversight Committee Summary Report Submittal:

October 30, 2025

November 10, 2025

January 5, 2026

January 12, 2026

Louisiana University Research and Development Parks Program

Notice of Intent:

Public Hearing:

Oversight Committee Summary Report Submittal:

November 7, 2025

November 29, 2025

November 30, 2025

Louisiana Biomedical Research and Development Park Program

Notice of Intent:

Public Hearing:

Oversight Committee Summary Report Submittal:

November 7, 2025

November 29, 2025

November 30, 2025

DEPARTMENT OF ECONOMIC DEVELOPMENT

TITLE 13 ECONOMIC DEVELOPMENT

Part I. Financial Incentive Programs

- 901, 905, 907, 909, 911, 915, 917, 919 (Last Revision 1992)
- 101, 103, 105, 109, 111, 113, 115, 301 (Last Revision 2000)
- 3101 (Last Revision 1974)
- 1301, 1303, 1305, 1307, 1309, 1311, 1313, 1315, 1317, 1319, 1321, 1323, 1325, 1327 (Last Revision 1993)
- 1501, 1503, 1505, 1506, 1507, 1509, 1511, 1513, 1515, 1516, 1517, 1518, 1519, 1521, 1525, 1527 (Last Revision 2000)

Part III. Financial Assistance Programs

- 1101, 1103, 1105 (Last Revision 1986)
- 901, 903, 905, 907, 909, 911, 913 (Last Revision 1990)
- 701, 703, 705, 709, 711, 713, 715 (Last Revision 1999)
- 501, 503, 505, 507, 509, 511, 513, 515, 517, 519, 521, 523, 525 (Last Revision 2000)
- 1501-1511 (Last Revision 2003)

Part V. Office of the Secretary

- 101, 103, 105, 107, 109, 111, 113, 115, 117, 119, 121 (Last Revision 1999)

TITLE 19 CORPORATION AND BUSINESS

Part I. Office of Women's Business Enterprise

- 101, 103, 301, 305, 501 (Last Revision 1984)
- 303 (Last Revision 1989)

Part II. Small and Emerging Business Development Program

- 101, 103, 117, 119, 901, 907-915, 1101, 1301, 1303 (Last Revision 2004)

Part III. Minority Business Enterprises

- 101, 301, 501, 503, 507-523, 901-1515, 1705, 1707, 1901-2301 (Last Revision 1985)
- 1517, 1701, 1703 (Last Revision 1987)
- 505, 701, 703 (Last Revision 1989)

Part VII. Louisiana Economic Development Corporation

- 2101-2123, 2315-2517, 5101-5123 (Last Revision 1989)
- 6101-6117 (Last Revision 1995)
- 2301-2313, 7501-7515 (Last Revision 1997)
- 7301, 7307 (Last Revision 1999)
- 7101-7237 (Last Revision 2000)
- 2701-2713, 7303, 7305, 7901-7911 (Last Revision 2003)

Exhibit B: ACT 192 - LED Agency Rule Review activity, 8/1/2024-12/31/2025

LAC Citation	Name	Is rule necessary & consistent with the law & LED's missions?	Do the benefits of the rule outweigh the burdens & costs on regulated persons?	LED proposed action
Title 13, ECONOMIC DEVELOPMENT, Part I. Financial Incentive Programs				
13,I.901	Restoration Tax Abatement (RTA)	Y	Y	Needs updating – target revision in 2026
13,I,101	Board of Commerce & Industry (BCI)	Y	Y	Needs updating – target revision in 2026
13,I,1301	LA Biomedical R & D Park Program	N	N	Repealed in 2025
13,I,1501	LA University R & D Park Program	N	N	Repealed in 2025
Title 13, ECONOMIC DEVELOPMENT, Part III. Financial Assistance Programs				
13, III, 1101	Local Economic Development Support Fund	N	N	Needs further evaluation – likely deletion, target revision in 2026
13, III, 901	LA Industrial Training Program	N	N	Needs further evaluation – likely deletion, target revision in 2026
13, III, 701	Regional Initiatives Program	N	N	Needs further evaluation – likely deletion, target revision in 2026
13, III,501	Port Development Program	N	N	Needs further evaluation – likely deletion, target revision in 2026
13, III, 1501	LA Project Equity Fund	N	N	Needs further evaluation – likely deletion, target revision in 2026

Title 13, ECONOMIC DEVELOPMENT, Part V Office of the Secretary				
13, V, 101	Substance Abuse & Drugfree Workplace Program	Y	Y	Needs further evaluation
TITLE 19 CORPORATION AND BUSINESS, Part I. Office of Women's Business Enterprise				
19. I.101	Women's Business Enterprise	N	N	Repealed in 2025
19. III.101	Minority Business Enterprise	N	N	Repealed in 2025
Title 19, CORPORATION AND BUSINESS Part VII Louisiana Economic Development Corporation				
19, VII, 2101	LA VC Capital Investment Program	N	N	Needs further evaluation – likely deletion, target revision in 2026
19, VII, 6101	Contract Loans	N	N	Needs further evaluation – likely deletion, target revision in 2026
19, VII, 2301	LA VC Match Program	N	N	Needs further evaluation – likely deletion, target revision in 2026
19, VII,7301	LA Small business Linked Deposit	N	N	Needs further evaluation – likely deletion, target revision in 2026
19, VII, 1501	BIDCO & Capital Access	N	N	Needs further evaluation – likely deletion, target revision in 2026
19, VII, 2701	University Foundation Investment Program	N	N	Needs further evaluation – likely deletion, target revision in 2026

This represents approximately 40% of LED's rules.

Operator	Field	District	Well Name	Well Number	Serial Number
PEL-TEX Oil Company, Inc.	Clam Bay	L	Orleans Levee Board	001	151496 (30) - pilings and cribbing
PEL-TEX Oil Company, Inc.	Wildcat- SO LA New Orleans Dis	L	Orleans Levee Board	002	152451(2 9) - pilings and cribbing

2510#032

Steven M. Giambrone
Interim Commissioner

POTPOURRI

Louisiana Economic Development Office of Economic Development

Notice of Public Hearing
Request for Comments on Rulemaking

In compliance with R.S. 49:964(B), and in accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., Louisiana Economic Development will hold a public hearing for the purpose of receiving comments on any rule of the agency on Wednesday, December 3, 2025, at 1:30 p.m. in the La Belle Room located on the first floor of the LaSalle Building, 617 North Third Street, Baton Rouge, LA 70802.

At the public hearing, all interested persons will be afforded an opportunity to submit comments either orally or in writing, regarding those rules the person believes are contrary to law, outdated, unnecessary, overly complex, or burdensome.

Written comments may be submitted to Stephanie Le Grange via email at: Stephanie.Legrange@la.gov or via certified mail to Legal Department - Stephanie Le Grange, Louisiana Economic Development, P.O. Box 94185, Baton Rouge, LA 70804. All written comments must include the name, contact information and signature of the person submitting the comments and must be received no later than 5 p.m. Tuesday, December 2, 2025. Louisiana Economic Development will consider fully all written and oral comments. However, only written comments received by the agency will be included in the department's report to the legislative oversight committees.

The hearing site is accessible to persons using wheelchairs or other mobility aids via the LaSalle Street entrance. If other reasonable accommodations are required in order to participate in the hearings, please contact Deborah Simmons at (225) 342-5398 at least five business days prior to the scheduled hearing.

Anne G. Villa
Deputy Secretary/CFO

2510#050

POTPOURRI

Board of Elementary and Secondary Education

Notice of Public Hearing on Proposed Rule
Child Safety and Welfare
(LAC 28:CLXI.Chapters 1-21;
LAC 28:CLXV.103, 310, 503, and 507)

Act 409 of the 2025 Regular Legislative Session amended certain regulations for early learning centers. In August of 2025, the Board of Elementary and Secondary Education approved, as a Notice of Intent, revisions to *Bulletin 137—Louisiana Early Learning Center Licensing Regulations* and *Bulletin 139—Louisiana Child Care and Development Fund Programs* to align with current statute. The Notice of Intent was published on pages 1376-1382 of the September 20, 2025, issue of the *Louisiana Register*. A request for a public hearing regarding the aforementioned Notice of Intent was received.

Public Hearing

In accordance with R.S. 49:953.A(2)(a) and R.S. 49:953.A(2)(b)(i), a public hearing will be held on October 30, 2025, at 9 a.m. in the Claiborne Building, Room 1-100 (The Louisiana Purchase Room), 1201 North Third Street, Baton Rouge, LA 70802. Interested persons are invited to attend.

Tavares A. Walker
Executive Director

2510#082

POTPOURRI

Board of Elementary and Secondary Education

Notice of Public Hearing Request for Comments on Rulemaking

Pursuant to Act No. 663 of the 2022 Regular Session of the Louisiana Legislature, codified as R.S. 49:964(B), and in accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the Board of Elementary and Secondary Education (BESE) hereby gives notice that a public hearing will be held on December 10, 2025, at 11 a.m. in the Claiborne Building, Room 1-153 (The Iowa Room), 1201 North Third Street, Baton Rouge, LA 70802, for the purpose of receiving comments from any interested person regarding any BESE rule contained in the *Louisiana Administrative Code*, Title 28, that may be contrary to law, outdated, unnecessary, overly complex, or burdensome.

Interested persons are invited to attend and submit oral or written comments. BESE will consider all written and oral comments; however, only written comments received by BESE will be included in the report submitted to the Louisiana legislative oversight committees. Written comments must be hand-delivered or mailed to the BESE office. Hand-delivered comments must be date-stamped by

Jeff Landry
Governor



Susan Bonnett Bourgeois
Secretary

December 3, 2025

All LED Rules Hearing – 1:30 pm

NAME	PHONE	EMAIL	AFFILIATION
Amanda Los	225 658 6065	amx@didierconsultants.com	Didier
Erin Foster	"	efoster@didierconsultants.com	Didier
Rhonda Boatner	"	rboatner@didierconsultants.com	"
Joy Banner	225 306 0851	joy@the descendedaff.com	TDP
Rev Tammy Peoples	225 623 3655		RR LT
Robyn Thiessen	337 215 0510	Robyn.dwla@gmail.com	PLSTH
Zan LeBoeuf	0-25 247-2675	zleboeuf@zleboeuf.com	Inclusive LGBTQIA+ 200151222
Anne Rolfe	504-484-3433	anne@ 1abucketbrigade.org	LA Bucket Brigade
Paul Speer	337-526-4673	pspeer@ccrjustice.org	CCR
Twila Collins	225-323-0077	denzelcuntrilla@yahoo.com	

December 3, 2025, All LED Rules Hearing

Oral comments summary:

Speaker 1: Dr. Jo Banner, CoFounder, The Descendants Project, St. John the Baptist Parish

- Detailed written comments are incorporated in organization letter dated 12/2/2025, submitted to LED.
- LEDC's statutory authority of La. R.S. 51:2312(B) provides that LEDC has the power, authority & duty to examine impediments to the success of Louisiana small businesses.
- Believes that LED's actions in approving big business projects contradict that authority.
- In addition LED's action hinder small business.
- In addition, LED fails to undertake due diligence in assessing valid date to support jobs and salary figures.

Speaker 2: Rev. Harry Joseph. Mt. Triumph Baptist Church, St. James Parish

- Detailed written comments are incorporated in organization letter dated 12/2/2025, submitted to LED.
- Objects to fast-tracking of permitting, CCS projects and use of NDA's.
- CF cited as an example of a project that did not create jobs for locals.

Speaker 3: Anne Rolfe, Director, Louisiana Bucket Brigade, New Orleans.

- Detailed written comments are incorporated in organization letter provided dated 12/2/2025, submitted to LED.
- Concerned with inequity in policy, focusing on big industrial projects rather than small businesses.
- Concerned about LED's response to a public records request.
- Objected to vague public notice for the hearing.
- LED mistakenly focuses efforts on out of state companies.
- Land for the Hyundai project in Ascension Parish is in census tracts that suffer from systemic poverty and have been neglected by LED and are now mistakenly being used for industrial development.

Speaker 4: Gail LeBoeuf, Co-Founder, Inclusive Louisiana, St. James Parish.

- Detailed written comments are incorporated in organization letter dated 12/2/2025, submitted to LED.
- Objects to sequestration projects and vague hearing notice.
- Objects to sweet heart deals such as the Hyundai project.
- High cancer and crime rates occur in the areas around the chemical plants and resident don't want any more.

Speaker 5: Robin Thigpen, Executive Director Fisherman Involved in Sustaining Our Heritage (FISH), Cameron Parish

- Detailed written comments are incorporated in organization letter dated 12/2/2025, submitted to LED.
- Economic development should not revolve around chemical plants.
- LNG plants have greatly impacted the fishing industry.
- Cameron Parish has no hospital and suffers from air and water pollution from chemical plants.
- Opposed to fast-tracking of permits when companies are in violation of existing permits.
- Locals are sick of being ignored and not being offered jobs.

December 2, 2025

Stephanie LeGrange
Louisiana Office of Economic Development
P.O. Box 94185
Baton Rouge, LA 70804
Via email to: Stephanie.Legrange@la.gov

Re: Comments on Rulemaking in Advance of Public Hearing on December 3, 2025

Dear Ms. LeGrange,

The undersigned write to express our serious concerns regarding the Louisiana Office of Economic Development's ("LED") increasing lack of transparency in matters that are of profound and urgent concern to the public. These matters impact people whose homes and lives are threatened in every corner of our state, from the data centers in the north to the gas export facilities near our coast, from the Carbon Capture and Sequestration schemes in central Louisiana to the massive expansions along the Mississippi River's Cancer Alley. This administration's plans will forever alter the landscape and the character of Louisiana, yet it is being done with great speed and in secrecy.

With so much at stake, the only notice that we have of this public hearing and comment deadline is vague and open-ended, calling for comments "on any rule of the agency" – providing no meaningful notice of what the Agency is considering.¹

Our concerns are as follows:

1. Plan to fast track industrial expansion. LED is seeking to fast-track processes to bring highly controversial and contested industrial development projects around the state that will have lasting, serious and harmful impacts to the communities targeted and to the land, air, and water in our state. These processes are also harmful to our democracy. One such process is the so-called *Lightning Speed Initiative*, implemented via executive order on September 16, 2025, which calls for LED to push state agencies to move faster on industrial permitting.²
2. The secrecy behind these plans. The acceleration around projects with such far-reaching repercussions and consequences and the poor public notice is bad enough. Worse, we are learning that LED's efforts in many instances are shrouded in secrecy through Non-Disclosure Agreements (NDA's) with local government officials and out-of-state corporations. These local government officials are then prevented from *speaking to their own constituents* about these projects and providing public access to public records about them.³

¹ Louisiana Register, Vol. 51, No. 10, Oct. 20, 2025, at 1776, available at <https://www.doa.la.gov/media/1dinjuty/2510.pdf>.

² Governor's executive order "Louisiana Lightning Speed Initiative" set out in Executive Order 25-102, Louisiana Register, Vol. 51, No. 10, Oct. 20, 2025, at 1544, available at <https://www.doa.la.gov/media/1dinjuty/2510.pdf>.

³ Three such agreements with local officials in Ascension Parish on file with Rural Roots Louisiana.

3. **The additional, dangerous element of Carbon Capture and Sequestration (CCS) projects.** The acceleration and secrecy are happening at the same time that LED is marketing the state for CCS projects⁴ and other projects to be powered by blue hydrogen, which relies on CCS technology and CO2 pipeline infrastructure.⁵ There is a clear and growing concern and opposition in the state to this type of infrastructure⁶ – and for good reason given all of the unknowns about the technology and the dangers it poses to aquifers, surrounding residents, and the fundamental property rights of Louisiana landowners.⁷
4. **Vague public notice.** Now, this office has issued a public notice for comment on rulemaking without giving any information whatsoever about what rule changes it is considering and why.
5. **Abuse of emergency rulemaking:** After it published notice about the hearing and rulemaking comment period, LED proceeded to promulgate emergency rules⁸ without prior notice or hearing to implement the “Site Investment and Infrastructure Improvement Fund,” which appropriates funds to be used “for economic development efforts, specifically for site investment and infrastructure improvements for economic development purposes.”⁹ To justify circumventing the normal rules for notice and hearing, LED invoked the “emergency rulemaking” law allowing for these types of procedures in “extraordinary circumstances” to “prevent imminent peril to the public health, safety, or welfare.” La. R.S. 49:962(A)(1)(a). We question whether LED’s desire to rush funding to some of the projects it is promoting constitutes such an “extraordinary circumstance” that presents the “imminent peril” the law was intended to address. To the contrary, we are concerned that many of the projects LED seeks to fast-track are what pose an imminent threat to the public health, safety, and welfare.

For decades, this office has subjected Louisiana to out-of-state and often foreign interests that have poisoned our communities, destroyed our coast and wetlands, and diminished so much of what is unique and special about us. This office has marketed areas of the state as open for business as though the

⁴ *Louisiana's Energy Development: Leading in Carbon Capture, Utilization, & Storage*, Louisiana Department of Economic Development (Mar. 11, 2025), <https://www.opportunitylouisiana.gov/news/louisianas-energy-development-leading-in-carbon-capture-utilization-storage>.

⁵ David Schlissel and Anika Juhn, *Blue Hydrogen: Not Clean, Not Low Carbon, Not a Solution: Making Hydrogen from Natural Gas Makes No Sense*, Institute for Energy Economics and Financial Analysis, September 2023, available at [090. David Schlissel and Anika Juhn, IEEFA, Blue Hydrogen Not Clean Not Low Carbon.pdf](https://www.iefa.org/reports/blue-hydrogen-not-clean-not-low-carbon.pdf).

⁶ David Mitchell, *Louisiana group challenges law for CO2 storage under private land*, [NOLA.com](https://www.nola.com/news/business/louisiana-carbon-capture-environment-energy-lawsuit/article_bae9ddf7-e20a-5d5c-9353-fa3f0c817f1c.html) (Nov. 21, 2025), https://www.nola.com/news/business/louisiana-carbon-capture-environment-energy-lawsuit/article_bae9ddf7-e20a-5d5c-9353-fa3f0c817f1c.html; Elise Plunk, *Central Louisiana residents, leaders sue state over carbon capture land grabs*, Louisiana Illuminator (Nov. 20, 2025), <https://lailluminator.com/2025/11/20/central-louisiana-residents-leaders-sue-louisiana-over-carbon-capture-land-seizures/>.

⁷ Natalie McLendon, *Local opposition mounts to carbon capture projects in Louisiana*, Louisiana Illuminator, Feb. 26, 2025, <https://lailluminator.com/2025/02/26/carbon-capture/>.

⁸ DECLARATION OF EMERGENCY, Louisiana Office of Economic Development, Louisiana Register, Vol. 51, No. 11, at 1806, available at <https://www.doa.la.gov/media/lounb2en/2511.pdf>.

⁹ Act 365 of 2025, Sec. 4, enacting La. R.S. 51:2316, Louisiana Legislature, available at <https://legis.la.gov/legis/ViewDocument.aspx?d=1425978>.

communities that have long lived there do not exist or matter. The Meta project in north Louisiana,¹⁰ the historic town of Modeste in Ascension Parish that is currently targeted for an industrial “megapark,”¹¹ and the fishing/shrimping/oystering/crabbing community in Cameron that is on the verge of extinction as a result of the LNG buildout are but three recent examples.¹²

The Ascension Parish example

The community of Modeste in Ascension Parish is a perfect example of all that is wrong in LED’s working model:

- LED is fast-tracking development of an industrial “MegaPark”¹³ that would wipe this historic town off the map, forcibly displace people who have lived in the tight-knit community for generations, and destroy valuable historic properties that have received national designation for their historic significance.
- The area targeted for development has long been zoned as a “conservation district” because it is “environmentally fragile” and “not served by roads which can handle large traffic increases.”¹⁴ Despite its environmentally fragile designation, LED has listed the MegaPark in its “Certified Sites Program,” certifying that it is “development-ready.”¹⁵
- LED is seeking to bring Hyundai Steel, a pig iron plant, and two ammonia facilities to the environmentally-fragile area. Three of these companies¹⁶ say they will rely on CCS technology and

¹⁰ Joe Wilkins, *Meta’s \$27 Billion Datacenter Is Wreaking Havoc on a Louisiana Town*, MSN, Nov. 25, 2025, <https://www.msn.com/en-us/autos/ownership/meta-s-27-billion-datacenter-is-wreaking-havoc-on-a-louisiana-town/ar-AA1R9iqM?ocid=BingNewsSerp>.

¹¹ Tyler Bridges and Stephanie Riegel, Hyundai’s new steel mill, seen as a huge win for Louisiana, has a \$600M taxpayer price tag, The Times Picayune, May 29, 2025, https://www.nola.com/news/business/hyundai-steel-mill-will-cost-taxpayers-in-louisiana-600m/article_267b82f7-006b-4d02-a934-cf468d881960.html.

¹² Nick Cunningham, *Louisiana LNG Could Be ‘Nail in the Coffin’ for Local Fishermen: Commercial fishing in southwest Louisiana is already facing hard times. But the rush to build LNG export terminals there may put an end to a once-vibrant industry*, DeSmog Blog, May 24, 2024, <https://www.desmog.com/2024/03/02/cameron-louisiana-lng-calcasieu-pass-fishermen/>.

¹³ *Louisiana’s next frontier: Ascension’s 17,000-acre RiverPlex MegaPark*, Greater Baton Rouge Business Report, Nov. 10, 2025, <https://www.businessreport.com/article/louisianas-next-frontier-ascensions-17000-acre-riverplex-megapark>.

¹⁴ [Ascension Parish Zoning Code, Sec. 17-2022\(a\)](#).

¹⁵ Greater Baton Rouge Business Report, *supra* n. 13.

¹⁶ Tiffany Bradford, *Hyundai Unveils \$6B Hydrogen-Powered Steel Mill in Louisiana, Aims to Position State as National Energy Leader: Massive Investment in Ascension Parish Targets Green Steel, Job Growth, and Hydrogen Infrastructure*, The Weekly Press, June 20, 2025, <https://www.brweeklypress.com/hyundai-unveils-6b-hydrogen-powered-steel-mill-in-louisiana-aims-to-position-state-as-national-energy-leader/>; Emilia Jackson, *Environmental Groups Sue Over Ammonia Plant Permits in Ascension Parish*, ChemAnalyst.News, Nov. 27, 2025, <https://www.chemanalyst.com/NewsAndDeals/NewsDetails/environmental-groups-sue-over-ammonia-plant-permits-in-ascension-parish-40198>; Greg LaRose, *CF Industries, Japanese partners to build \$4B ‘blue’ ammonia plant in Ascension Parish*, Louisiana Illuminator, Apr. 8, 2025, <https://lailluminator.com/2025/04/08/blue-ammonia/>.

infrastructure, which includes CO2 pipelines. CO2 pipelines are deadly and dangerous, according to the Pipeline Safety Trust.¹⁷

- *CO2 is an asphyxiant that's heavier than air, and it can travel large distances at lethal concentrations from the pipeline after a rupture.¹⁸ And see, e.g., what happened in See, e.g., [Satartia, Mississippi](#).¹⁹*
- *CO2 pipelines are susceptible to ductile fractures, which can, like a zipper, open up and run down a significant length of the pipe, they can release immense amounts of CO2, hurl large sections of pipe, expel pipe shrapnel, and generate enormous craters.²⁰*
- *Water, notoriously difficult to eliminate from CO2 pipelines, allows the formation of carbonic acid in the pipeline which has a ferocious appetite for carbon steel.²¹*

- Making matters even worse, LED has entered into NDA's with local officials, as well as with officials of Hyundai Steel, who are prevented from speaking with us about these projects, and Parish officials have said public records about these projects are exempt from disclosure under the Public Records Law.
- This comes after years of disinvestment in Modeste, closure of services, and zoning restrictions that prevented local businesses from operating there – because it was a conservation area.

Rather than seeking to sell our state to outside interests that do harm and destroy communities like Modeste, LED could be looking within and investing in and building upon the uniqueness, creativity, talent, diversity, richness, and resilience we have here. After 90 years of LED's existence and decades of promises about these industries that never materialize, Louisiana still ranks last overall in national rankings, and always at or near the bottom in education (46), fiscal stability (46), infrastructure (48), natural environment (49), and opportunity.²² The solution is not to repeat these mistakes.

Rather than changing the rules to allow LED and our state agencies to race ahead and do more of the same, only faster and bigger, we demand that you pause and take stock of the fact that what this office has been

¹⁷ Pipeline Safety Trust, *Carbon Dioxide Pipelines*, <https://pstrust.org/carbon-dioxide-pipelines/>.

¹⁸ *Id.*

¹⁹ [Dan Zegart, The Gassing of Satartia: A CO2 pipeline in Mississippi ruptured last year, sickening dozens of people. What does it forecast for the massive proposed buildup of pipelines across the U.S.?](#) HuffPost, Aug. 26, 2021, https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f.

²⁰ Pipeline Safety Trust, *supra* n. 17.

²¹ *Id.*

²² Presley Bo Tyler, *With poor education and infrastructure, Louisiana ranked worst state by U.S. News & World Report*, Shreveport Times, May 7, 2025, <https://www.shreveporttimes.com/story/news/2025/05/07/what-are-best-and-worst-states-in-the-u-s-what-u-s-news-world-report-says-louisiana-worst-states/83495158007/>.

doing hasn't worked. While much has already been lost, and lives and communities have been sacrificed, it's not too late to save what's left, and build from there.

Signed,

Ashley Gaignard

Ashley Gaignard, President, Rural Roots Louisiana, Ascension Parish - ashley@ruralrootslouisiana.org

Joy Banner

Joy Banner, Co-Director and Co-Founder, The Descendants Project, St. John the Baptist Parish - joy@thedescentantsproject.org

Pastor Harry Joseph

Pastor Harry Joseph, Mt. Triumph Baptist Church, St. James Parish – (225) 623 – 3655

Robyn Thigpen, FISH

Robyn Thigpen, Executive Director, Fishermen Involved in Sustaining Our Heritage (FISH), Cameron Parish - robyn.swla@gmail.com

Joe & Robin Williams

Joe and Robin Williams, neighbors of proposed Meta Data Center, Richland Parish – mawmawnay@icloud.com

Gail LeBoeuf

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Adrian Alpay

Submitted by: Adrian Alpay, Attorney and Primary Contact - adrian@alpaylaw.net



Anne G. Villa % Stephanie Le Grange
Stephanie Le Grange,
Louisiana Economic Development, P.O. Box 94185, Baton
Rouge, LA 70804.

December 2, 2025

Dear Anne,

On behalf of The Descendants Project, a community-based nonprofit in St. John the Baptist Parish, I am submitting this letter in response to the Notice of Public Hearing and Request for comments on Rulemaking for Louisiana Economic Development. The High opportunity costs of LED's proposed new rule including unnecessarily exposing community members to health, environmental and business risk is shrouded by superficial business analyses and questionable outcomes. In addition, we believe that LED's actions contradict RS 51:2312(B) which states:

The corporation has the power, authority, and duty to examine the impediments to the success of Louisiana small businesses from time to time and to adjust existing programs and develop financial programs that will alleviate such impediments.

This bias is glaringly obvious for the river parishes of St. John the Baptist, St. James, and Ascension—parishes within Louisiana's Cancer Alley, which are in the heart of a robust heritage, cultural, and tourism market that produces tax breaks, jobs, and other benefits for the economy.

According to the 2023 Tourism Spending in Louisiana Parishes report prepared by UNO for The Department of Culture, Recreation, and Tourism, visitors spend \$440 million in these four parishes. Ascension Parish, which is being aggressively targeted by heavy industry, accounts for more than half of this total with \$220 million in visitor spending. Our home and base of St. John the Baptist parish accounts for \$80 million in visitor spending resulting in jobs and businesses that go unacknowledged and unaccounted for.

The tourism and heritage economy provides jobs in a diverse range of fields including museum staff, transportation, carpentry, education, landscaping, management, etc and at every stage from entry level to director, and at every education level from high school diploma to advanced degrees. Tourism and heritage is also creating opportunities for small business ownership. In addition, each household saves an additional \$1137 in tax dollars. Louisiana

LED has created impediments for small businesses and hurdles for the heritage and tourism industry by supporting developments. These industrial projects impact historic and cultural landscapes, impacting businesses and jobs. LED fails to consider the impact to the film industry which is a department of LED.

LED fails to practice due diligence nor requires valid data to support salary figures, permanent jobs, indirect jobs, and multiplier effects. For example, Dr. Kimberly Terrell's recent [study](#) exposed that people of color are underrepresented in "good" plant jobs but overrepresented in communities that are most impacted by pollution.

RS 51:2312 (B) gives LED the power to examine impediments to Louisiana small businesses regardless of industry. This examination must rely on sound, accurate and objective data not inflated public relations statements.

Sincerely,

Jo Banner

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